

EXHIBIT C

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HEARTS ON FIRE COMPANY, LLC,

Plaintiff,

v.

EIGHTSTAR DIAMOND COMPANY and
GRS JEWELERS, INC.

Defendant.

CIVIL ACTION NO. 04 12258-JLT

**DEFENDANT EIGHTSTAR DIAMOND COMPANY'S RESPONSES TO
PLAINTIFF HEARTS ON FIRE COMPANY, LLC'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

On January 31, 2006, Hearts On Fire made six requests for production of documents. See attached Exhibit 1. EightStar responds as follows:

DOCUMENTS

Request No. 1: Spectrum Gems' sales records that provide information about persons who purchased EightStar diamonds directly because they were outside the geographic area of authorized EightStar retailers.

RESPONSE:

EightStar objects to this request in that it requests documents which are neither relevant nor will lead to probative evidence. In addition, this document request is burdensome.

Request No. 2: Records of EightStar retailer reimbursement requests for advertising expenditures spent on advertising EightStar diamonds.

RESPONSE:

EightStar objects to this request based on the fact that the requested documents are neither relevant nor will they lead to probative evidence. However, notwithstanding these objections EightStar states that there were no reimbursement requests in 2005. In 2004 there were a few (probably 2 or 3) and EightStar will look for these and produce them if found.

Request No. 3: Records and/or invoices depicting amounts EightStar paid to Mr. Brad Huiskens for providing individualized training sessions to EightStar dealers.

RESPONSE:

See attached documents.

Request No. 4: A copy of the email from Peter Yantzer to Richard Von Sternberg dated in or about June 1996 in which Mr. Yantzer writes that he believes EightStar diamonds are "the most perfectly cut diamonds on the planet."

RESPONSE:

See attached document.

Request No. 5: Copies of all versions of the EightStar PMSA Relationship Selling Program manual.

RESPONSE:

None other than what has been produced.

Request No. 6: Copies of all videotaped recordings of the EightStar dealer conferences including, but not limited to, the 2003 and 2005 tapes and any others that were not destroyed.

RESPONSE:

EightStar is working on making copies of the 2005 tape of the dealer conference and will produce them once complete.

RESPONSES DATED this 21st day of March, 2006.

EIGHTSTAR DIAMOND COMPANY

By its attorneys,

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